

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	

COMMENTS OF T-MOBILE USA, INC.

T-Mobile USA, Inc.¹ (“T-Mobile”) is pleased that the Commission continues to investigate ways to empower wireless carriers to improve service for customers.² Fraudulent calls are a major concern for T-Mobile customers as well as for T-Mobile. T-Mobile is eager to continue and expand its efforts to reduce the number of fraudulent calls received by its customers.

Following the Commission’s Public Notice allowing carriers to block calls using a spoofed number if requested by the number’s subscriber,³ and the subsequent Robocall Strike Force Report,⁴ T-Mobile launched two services designed to alert customers to the potential for fraudulent calls and allow them to request those calls be blocked. Scam ID alerts customers when an incoming call is likely to be a scam by tagging the incoming call for the customer, while

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly-traded company.

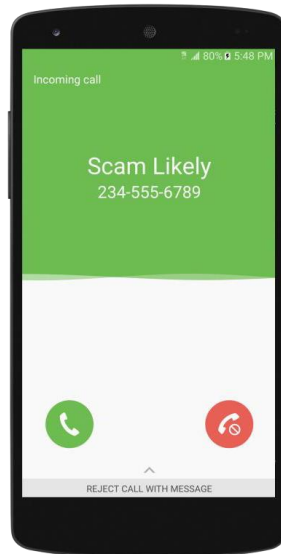
² *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Notice of Proposed Rulemaking and Notice of Inquiry, FCC 17-24, CG Docket No. 17-59 (rel. Mar. 23, 2017) (“NPRM”).

³ *Consumer and Governmental Affairs Bureau Clarification on Blocking Unwanted Robocalls*, Public Notice, 31 FCC Rcd. 10961 (2016).

⁴ Robocall Strike Force, *Robocall Strike Force Report* at 1 (2016), <https://transition.fcc.gov/cgb/Robocall-Strike-Force-Final-Report.pdf>.

Scam Block allows customers to proactively ask T-Mobile to block those calls identified as scam calls.

A T-Mobile customer who has signed up for Scam ID will see an alert on the screen of his or her mobile device indicating that an incoming call is likely to be fraudulent, as depicted below:



All incoming calls are analyzed against databases of numbers known to be used by scammers, as well as against operational profiles and rules that identify features common to fraudulent calls. By identifying calls that are likely to be fraudulent, T-Mobile allows customers to choose to reject those calls.

If customers want to proactively block all calls that T-Mobile identifies as being likely to be fraudulent, they can sign up for Scam Block. Once the customer has elected to use the service, they will no longer receive calls that T-Mobile identifies as fraudulent. Customers may also turn off Scam Block at any time, while continuing to receive Scam ID alerts.

T-Mobile is able to provide these services to its customers because of enhancements it has made to its network. Using a combination of proprietary technology and vendor services,

every incoming and outgoing call on T-Mobile’s network is analyzed and—when requested by a customer—calls that are highly likely to be fraudulent are blocked. Because Scam ID and Scam Block are network-based, calls are analyzed as they transit the network, as compared to over-the-top applications that can only analyze calls once they reach a customer’s handset. And because this patent-pending technology is built into T-Mobile’s network, T-Mobile can identify potentially fraudulent calls for every single subscriber, regardless of their chosen device.

T-Mobile encourages the Commission to continue to empower carriers to adopt the best possible means for their networks of identifying and blocking fraudulent calls. For instance, T-Mobile is pleased that the Commission has proposed expanding the categories of fraudulent calls that carriers may block *without* the request of a customer. T-Mobile agrees with the Commission’s proposal to codify its earlier guidance, allowing carriers to block calls originating from a number where the subscriber to whom that number is assigned has requested the block, to prevent his or her number from being spoofed.⁵

T-Mobile also agrees that the Commission should allow carriers to block calls from invalid numbers and from valid but unallocated numbers.⁶ Permitting carriers to take these steps will allow T-Mobile to preemptively reject many fraudulent calls, and will free its customers of the requirement to proactively request blocking of those calls. As the Commission notes, there is no possibility that incoming calls from invalid and unallocated phone numbers could be legitimate calls, and blocking such calls bears no risk to network reliability.⁷

⁵ NPRM ¶ 14.

⁶ *Id.* ¶¶ 17, 19.

⁷ *Id.* ¶ 17 (“Further, because these numbers are not valid, there is no possibility that a subscriber legitimately could be originating calls from such numbers. Nor do we foresee any

T-Mobile, however, does not support the Commission's proposal to allow carriers to unilaterally block incoming calls from numbers allocated to a carrier but that are unassigned to a subscriber.⁸ The Commission should not prevent carriers from developing tools—including through a collaborative industry approach—to allow customers to ask their carriers to block calls from such numbers. But because of the current difficulty in identifying whether numbers that have been allocated to a carrier have or have not been assigned to a subscriber, granting carriers the unilateral authority to block such numbers presents a higher risk that valid calls will be blocked without the consent of customers.

Finally, T-Mobile encourages the Commission to refrain from mandating any particular means that carriers must use to identify whether a given valid number is unassigned. Rather, the Commission should allow carriers to use any method that allows the carrier to quickly and reliably determine whether the number is unassigned. Mandating particular technological means would reduce carriers' ability to innovate to develop better solutions for preventing fraudulent calls.

Respectfully submitted,



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reasonable possibility that a caller would spoof such a number for any legitimate, lawful purpose.”).

⁸ *Id.* ¶ 21.